

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SUN CHENYAN)	
)	
Plaintiff,)	
)	Case No. 20-cv-0220
v.)	
)	Judge John F. Kness
THE PARTNERSHIPS AND)	
UNINCORPORATED ASSOCIATIONS)	Mag. Judge M. David Weisman
IDENTIFIED ON SCHEDULE "A",)	
)	
Defendant.)	
)	

**JOINT MOTION OF PLAINTIFF, DEFENDANTS, AND PROPOSED
INTERVENORS, TO VACATE CASE MANAGEMENT FILING DEADLINE**

Plaintiff Sun Chenyan (“Plaintiff”), by and through her counsel, Ford Banister IP, and Defendants Jane Chen, Li Dong “Vivi/Vivian” Fang, Lily Zou, and Min Xiao (“Defendants”) by and through their counsel Dykema Gossett PLLC, and Proposed Intervenors listed on D.E. 268-1 (“Proposed Intervenors”), by and through their counsel, Dykema Gossett PLLC, submit the following Joint Motion to Vacate Case Management Filing Deadline:

1. On September 24, 2024 this Court entered a Minute Order directing Plaintiff to file its amended complaint in this matter on or before September 27, 2024, for Defendants to answer or otherwise respond to the amended complaint on or before October 18, 2024, and for the parties to confer and file a proposed case management schedule on or before October 25, 2024. [D.E. 263].
2. Plaintiff filed her amended complaint on September 26, 2024 as D.E. 264.

3. Proposed Intervenors filed their Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(B)(7) or, Alternatively, Motion to Intervene Pursuant to FED. R. CIV. P. 24 on October 18, 2024 without prior notice to Plaintiff. [D.E. 268] (“Proposed Intervenors’ Motion”).
4. Proposed Intervenors’ Motion was stricken without prejudice on October 24, 2024 for failure to comply with this Court’s motions policy. [D.E. 269].
5. Plaintiff, Defendants, and Proposed Intervenors have conferred and are unable to propose a case management schedule until a resolution is reached as to Proposed Intervenors’ Motion.
6. Plaintiff, Defendants, and Proposed Intervenors jointly agree that it is premature to schedule case management at this time.
7. Plaintiff, Defendants, and Proposed Intervenors jointly request that the deadline to file a case management schedule on October 25, 2024 be vacated.

Respectfully submitted this 25th day of October, 2024,

By:

/s/ Michael T. Stanley

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Date: October 25, 2024

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